

**To:** Reeves, Bruce@DOC[Bruce.Reeves@conservation.ca.gov]  
**Cc:** Turner, Justin@DOC[Justin.Turner@conservation.ca.gov]  
**From:** Engelman, Alexa  
**Sent:** Wed 4/29/2015 7:37:15 PM  
**Subject:** RE: Letter to operators

Bruce:

Thank you for your email and apologies for not copying you on my prior email, I thought it was a simple request for existing documentation to be forwarded but I was mistaken. Indeed, the Monday call appears to be going forward, I received confirmation when I proposed the time and sent out another request for confirmation. What is the best number to reach both you and Justin Monday?

We look forward to discussing these issues with you,

Best,

Alexa

**From:** Reeves, Bruce@DOC [mailto:Bruce.Reeves@conservation.ca.gov]  
**Sent:** Wednesday, April 29, 2015 11:26 AM  
**To:** Engelman, Alexa  
**Cc:** Turner, Justin@DOC  
**Subject:** FW: Letter to operators

Alexa, Justin forwarded me your email. Please try to copy me on UIC correspondence, if you don't mind. Justin and I work together on this stuff.

We haven't sent the operators a letter, per se, soliciting documentation on whether their zone of injection meets the aquifer exemption criteria. However, as you probably are aware, our emergency regulations and accompanying notice state that the operators will have to shut in if the USEPA doesn't take action to determine that the target aquifer or portion meets the aquifer exemption criteria. That notice and regs package went to the operators. Additionally, during the two AE workshops, we indicated to the operators that documentation would be needed.

My understanding is that one operator has sent in documentation pertaining to an area within the 11, so presumably the message is being heard.

We will likely have further discussions with the operators on this topic. It would be helpful for us to know, before those discussions take place, what process will be undertaken at your end once the State has sent you its view on whether an aquifer among the group of 11, or a portion of it, addressed in new operator documentation, meets the aquifer exemption criteria.

By the same token, it would be good if you let us know what process your agency intends to use to signal to affected operators that some or all of an aquifer in the group of 11 is in imminent danger of no longer being exempt, or treated as exempt.

On this subject, is the Monday call going forward? I seem to recall someone had to beg off, but haven't taken the time to search my email.

**Bruce Reeves**

Chief Counsel

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Begin forwarded message:

**From:** "Engelman, Alexa" <ENGELMAN.ALEXA@EPA.GOV>

**Date:** April 28, 2015 at 2:41:01 PM PDT

**To:** "Justin@DOC Turner (Justin.Turner@conservation.ca.gov)"

<Justin.Turner@conservation.ca.gov>

**Subject:** Letter to operators

Justin-

Apologies if this was already sent over to EPA, but could you share with us a copy of the letter that went to operators in the 11 aquifers historically treated as exempt regarding the need for updated documentation to support aquifer exemptions in the formations?

Thanks,

Alexa

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Alexa Engelman, Esq.

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